

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In Re:

LUIS TORRES AND
ALICIA TORRES

Case No. 12-22858

Chapter 7

NOTICE OF MOTION

Debtors.

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Upon the annexed affirmation of Jordan S. Katz, Esq., dated October 10, 2014 and the exhibits annexed thereto, Bank of America, N.A. as servicer for U.S. Bank National Association, as Trustee, for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-SP4, a secured creditor, will move this court before the Hon. Robert D Drain, United States Bankruptcy Judge, on the 8th day of December, 2014 at 10:00 am o'clock in the forenoon of that day, or as soon thereafter as counsel may be heard, at the courthouse located at 300 Quarropas St, Courtroom 118, White Plains, NY 10601 for an order pursuant to 362(d)(1) & (2) of the Bankruptcy Code modifying the automatic stay so that U.S. Bank National Association, as Trustee, for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-SP4, as secured creditor, can foreclose the mortgage it holds on the premises known as 120 SICKLES AVE, NEW ROCHELLE, NY 10801, on the grounds that (a) U.S. Bank National Association, as Trustee, for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2006-SP4 is not adequately protected; (b) Debtor has little or no equity in said premises and (c) for such other and further relief as this Court deems just and proper.

Dated: October 10, 2014
Melville, New York

Kozeny, McCubbin & Katz, LLP

/s/ Jordan S. Katz
By: Jordan S. Katz, Esq.
Attorneys for Movant
395 N Service Rd, Suite 401
Melville, New York 11747
(631) 454-8059

TO:

Linda Tirelli, Esq.
Attorney for Debtors
Westchester Financial Center
50 Main Street
Suite 390
White Plains, NY 10606

Luis Torres
Alicia Torres
Debtors
120 Sickles Avenue
New Rochelle, NY 10801

EMC Mortgage Corp
Lienholder
PO Box 293150
Lewisville, TX 75029

Mark Tulis
Trustee
120 Bloomingdale Road
White Plains, NY 10605

U.S. Trustee
Office of the United States Trustee
U.S. Federal Office Building
201 Varick Street, Suite 1006
New York, NY 10014